

REMARKS

Applicant respectfully requests reconsideration of the instant application in view of the foregoing amendments and following remarks. Claims 1-104 are currently pending in the application. Claims 1, 7, 13, 19, 25, 30, 35, 40, 45, 46, 51, 52, 57, 58, 63, 64, 69, 75, 81, and 87 have been amended. Applicant submits that no new matter has been added by way of this amendment.

The Examiner has noted that various trademarks should be capitalized and accompanied by generic terminology throughout the application. Applicant submits that the use of the terms fairly describe illustrative examples of aspects of the invention described in the specification. However, the preceding amendments to the specification address the issue of capitalization, and Applicant submits that the Examiner is invited to contact the undersigned or otherwise suggest accompanying generic terms to alleviate the Examiner's concerns in this regard.

**Rejections under 35 USC § 102**

Claims 1-92 were rejected under 35 USC § 102(e) in view of USP 6,535,883 to Lee. Claims 93-104 were also rejected under 35 USC § 102(e) in view of Nugent ("Addressing For Field Validation with regular Expressions and JavaScript 1.2," 11/1997). Applicant respectfully traverses these rejections and submits that the amended claims are patentably distinct from the cited references.

With regard to claims 1-92, the Examiner states, "The claims do not recite 'subclass or take on different characteristics from its parent.' Further, Lee discloses the rules file stores the validation rules are stored in the rules files and the tree structure can be updated to reflect

validation level and override mode of the new rule to be defined (col. 4 lines 27-41 and Fig 5A)." (See, March 8, 2006 Office Action, page 12, ¶ 5). Applicant has amended independent claims 1, 7, 13, 25, 30, 35, 40, 45, 51, 57, 62, 68, 75, 81 and 87 to further clarify these claims. As amended, the claims better capture the desired embodiment, however Applicant asserts that the previous versions of the claims were also patentable and reserves the right to return to them and seek allowance at a future time.

Applicant respectfully submits that the amended claims are patentably distinct from the cited reference. Specifically, these claims recite "customizable validation rules" and "hereditary rules library", which the cited reference fails to teach or suggest. The Examiner has previously invoked the "expression templates" (col. 3, lines 46-47) of Lee's disclosure as anticipating particular elements of claims 1-92. Applicant respectfully submits that "expression templates" do not teach or disclose "customizable validation rules" and "hereditary rules library". In particular, "expression templates" are static forms with limited, "fill-in-the-blanks" (col. 3, line 53) customizability. They certainly lack the ability, as in one example embodiment, to be subclassed or take on different characteristics from its parent as may be achieved by the claimed customizable validation rules contained in a hereditary rules library.

Furthermore, Applicant respectfully submits that validation rules, as described in Lee, does not teach or disclose "customizable validation rules" and "hereditary rules library". Neither do the "validation level" and "override mode" of a given rule disclose or teach elements of the present invention. The validation level merely sets, "where the validation rule is to be executed": either at the "field level", where the rule is "executed when the worker moves off the field" or at the "form level", where the rule is executed when "the form being filled out by the mobile worker has been completed and sent back to the computer". The override mode merely sets whether "the

worker is allowed to transmit the form even if the data entered into the selected field failed the associated validation rule." Neither module allows a rule to be subclassed or take on different characteristics from its parents, as may be achieved with the claimed "customizable validation rules" contained in a "hereditary rules library".

With regard to claims 93-104, the Examiner rejects independent claims 93, 96, 99, 102, and accordingly their dependents, by asserting, "JavaScript 1.2 supports regular expression and provides common object detection routines such as window.RegExp that detects the browser compatibility." Applicant respectfully submits that the claims are patentably distinct from the provisions and/or capabilities of JavaScript 1.2, which is merely a programming language and nothing more in and of itself. A programming language does not disclose or teach a particular embodiment simply because that embodiment might possibly be implemented using that language. As a specific example, neither JavaScript 1.2 nor the tutorial on JavaScript 1.2 commands provided in Nugent disclose or teach, "determining if the browser does not support non regular expression language, and if not, providing regex enabled validation on a server;".

Accordingly, Applicant submits that the cited references fails to disclose or teach: customizable validation rules contained in a hereditary rules library; and the ability to choose an appropriate validation deployment based on the determination of browser capabilities. Based on the deficiencies of the cited references discussed above, Applicant respectfully submits that the cited references fail to anticipate any of claims 1-104. Therefore, Applicant requests withdrawal of these grounds of rejection.

### **CONCLUSION**

Consequently, the reference(s) cited by the office action do not result in the claimed invention, there was/is no motivation for such a combination of references (i.e., cited references do not teach, read on, suggest, or result in the claimed invention(s)), and the claimed inventions are not admitted to be prior art. Thus, the Applicant respectfully submits that the supporting remarks and claimed inventions, claims 1-104, all: overcome all rejections and/or objections as noted in the office action, are patentable over and discriminated from the cited reference(s), and are in a condition for allowance. Furthermore, Applicant believes that the above remarks, which distinguish the claims over the cited reference(s), pertained only to noted claim element portions. These remarks are believed to be sufficient to overcome the prior art. While many other claim elements were not discussed, Applicant asserts that all such remaining and not discussed claim elements, all, also are distinguished over the prior art and reserves the opportunity to more particularly remark and distinguish such remaining claim elements at a later time should it become necessary. Further, any remarks that were made in response to an Examiner objection and/or rejection as to any one claim element, and which may have been re-asserted as applying to another Examiner objection and/or rejection as to any other claim element(s), any such re-assertion of remarks is not meant to imply that there is commonality about the structure, functionality, means, operation, and/or scope of any of the claim elements, and no such commonality is admitted as a consequence of any such re-assertion of remarks. As such, Applicant does not concede that any claim elements have been anticipated and/or rendered obvious by any of the cited reference(s). Accordingly, Applicant respectfully requests allowance, and the reconsideration and withdrawal of the rejection(s) and/or objection(s).

If a telephone conference would facilitate prosecution of this application in any way, the Examiner is invited to contact the undersigned at the number provided.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 03-1240, Order No. 17200-074US1. In the event that an additional extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 03-1240, Order No. 17200-074US1.

Respectfully Submitted,  
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